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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

KINEKT DESIGN, LLC,	:	CASE NO. 2:12-cv-07143(SRC) (CLW)
	:	
	:	
Plaintiff,	:	NOTICE OF MOTION
	:	FOR PRELIMINARY INJUNCTION
vs.	:	
	:	
ARNOLD VAGTS,	:	
	:	
Defendant.	:	
	:	

TO: Arnold Vagts
1291 S. Carl Street
Anaheim, California 92806
avagts@gmail.com

PLEASE TAKE NOTICE, that on February 4, 2013, at 9:00 am, or as soon thereafter as counsel may be heard, the undersigned attorney for Plaintiff, Kinekt Design, LLC, shall move before the Honorable Stanley R. Chesler, U.S.D.J., at the United States District Court for the District of New Jersey, Post Office Building and Courthouse Building, 50 Walnut Street, Room 02, Newark, New Jersey 07101, for entry of a Preliminary Injunction enjoining and restraining Defendant, Arnold Vagts, and all other persons or entities acting in concert or participation with

Defendant, from further infringement of Plaintiff's patent, trademark and/or copyright, and related relief.

PLEASE TAKE FURTHER NOTICE, that in support of this Motion, Plaintiff will rely upon the Affidavit of Glen Liberman, Certification of Angela Vidal, Esq. and Memorandum of Law submitted herewith, as well as the Verified Complaint previously filed in this matter. A proposed form of Order is also attached.

Respectfully submitted,
ANGELA VIDAL, ESQ.
Attorney for Plaintiff

/s/Angela Vidal
Angela Vidal, Esq.

Dated: December 28, 2012